

JT SINGH, ESQ.  
Singh Law, P.A.  
1407 Broadway, Suite 3412  
New York, NY 10018-5154

Tel: (917) 768-4763

Fax: (212) 719-2461

July 16, 2018

Honorable Michael A. Hammer, U.S.M.J.  
United States Magistrate Judge  
United States District Court  
For the District of New Jersey  
50 Walnut St #4015  
Newark, NJ 07102

Re: **MOTION TO HOLD CASE IN ABEYANCE: GLADYS ECHEGOYEN V. U.S. STANDARD  
HOLDINGS TRUST, ET AL.: CASE NO.: 2:15-CV-06382-KM-MAH**

Dear Judge Hammer:

As the record shows, Defendants have been unable to find appropriate counsel, but I have been recently admitted in this jurisdiction and have been retained to represent them in the above-mentioned matter. I have reached out to the Plaintiff's lawyer but has not responded to my request and, therefore, submit this motion letter requesting to hold the Plaintiffs' motion for default judgment in abeyance and allow the annexed demand for discovery and inspection to move forward.

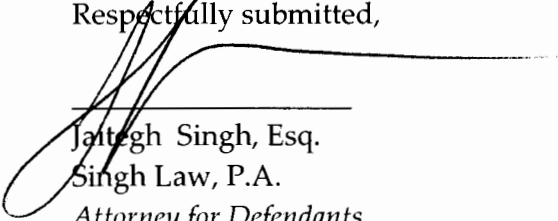
Defendants have denied all of Plaintiff's allegations and had no opportunity to resolve the case on the merits. No discovery has been performed and the Plaintiff has brought forth allegations against the Defendants claiming unpaid minimum and overtime wages in violation under the Federal Fair Labor Standards Act, (hereinafter "FLSA") or unpaid minimum and overtime wages under the New Jersey Department of Labor and Workforce Development (hereinafter "NJWHL").

A federal trial court has the discretion to hold a case in abeyance. See Anthem, Inc. v. Bristol-Myers Squibb Co., Civil Action No. 03-0008, 2003 U.S. Dist. LEXIS 15762, at \*6 (D.N.J. Mar. 17, 2003), quoting Landis v. N. Am. Co., 299 U.S. 248, 254-55, 81 L. Ed. 153, 57 S. Ct. 163 (1936). The Defendants have not defended such due to inability to retain adequate representation.

Wherefore, I respectfully request that this letter motion be considered and that this case and any decision thereof be held in abeyance.

cc.: Michael Taubenfeld.,  
Serrins Fisher, LLP.,  
*Attorneys for Plaintiff*  
233 Broadway  
Suite 2340 NY, NY 10279

Respectfully submitted,

  
Jattegh Singh, Esq.  
Singh Law, P.A.

*Attorney for Defendants*

Enc.: Requests For Production